

IN THE UNITED STATES DISTRICT
COURT FOR THE WESTERN DISTRICT OF
MISSOURI WESTERN DIVISION

UNITED STATES OF AMERICA
PLAINTIFF,

CASE No.
17-00132-01 / 04-cw

v.

GAF

EDWARD J GLEASON

D.O.B: 7-20-75

DEFENDANT,

MOTION TO REMOVE or DISMISS
DEFENSE COUNSELOR FOR
INEFFECTIVE ASSISTANCE
(IN FORMA PAUPERIS)

COMES NOW, I THE DEFENDANT EDWARD
J. GLEASON FOR THE SECOND ATTEMPT REQUEST
DISMISSAL OR REMOVAL of DEFENSE COUNSELOR
ROBERT KUCHAR FOR INEFFECTIVE ASSISTANCE
of COUNSEL.

ROBERT KUCHAR, SINCE HIS APPOINTMENT AS
MY DEFENSE ATTORNEY, HAS, and IS, REFUSING TO
REPRESENT ME COMPLETELY, ADEQUATELY, and
EFFECTIVELY AS IT IS MY 6th AMENDMENT
RIGHT TO HAVE EFFECTIVE COUNSEL PURSUANT
TO THE UNITED STATES CONSTITUTION.

I HAVE TRIAL APPROACHING IN FEBRUARY
OF 2019, and COUNSEL IS "STILL" REFUSING TO

INVESTIGATE ANY AREA OF MY CASE REGARDING THE FACTS AS "I'VE" TRIED SUBMITTING TO ROBERT KUCHAR IN THE PAST, ONLY TO COME UP SHORT, AS HE AND I HAVE VERY LITTLE COMMUNICATION IN THE TWENTY ONE MONTHS I'VE BEEN INCARCERATED.

I AM STRESSFULLY "REITERATING" MY BELIEF, THROUGH COUNSEL'S OWN ACTIONS, THAT HE IS TRYING TO ACHIEVE THE EXACT SOMETHING MY ADVERSARY (THE GOVERNMENT) IS TRYING TO ACHIEVE, WHICH IS A GUILTY PLEA, OR A FINDING OF GUILT. THE WAY COUNSELOR (1) HAS YET TO VISIT WITH ME HIMSELF, SO THAT "WE" COULD/CAN GO OVER ALL THE EVIDENCE LODGED AGAINST ME IN MY DISCOVERY. (2) HAS YET TO VISIT WITH ME TO DISCUSS PLAUSABLE LINES OF DEFENSE, OR A VIABLE DEFENSIVE STRATEGY, BEINGS THAT I'VE REPEATEDLY STATED MY WILLINGNESS TO PROCEED FORWARD WITH TRIAL. (3) HAS YET TO DISCLOSE MY "ENTIRE DISCOVERY" TO ME, HIS CLIENT/DEFENDANT, WHICH SEEMS TO VIOLATE MY 14th AMENDMENT & DUE PROCESS.

ROBERT KUCHAR IS NOT WILLING TO PERFORM THE NECESSARY DUTIES THAT CONSIST OF BEING MY LAWYER. HIS REFUSAL TO FILE THE "NECESSARY" AND "SUFFICIENT" MOTIONS THAT "WOULD" "SUBSTANTIATE" A "SUBSTANTIAL" NUMBER OF COUNTS CHARGED AGAINST ME "REMOVED/DROPPED."

THE 6th AMENDMENT STATES CLEARLY: DEFENSE

COUNSEL CAN DEPRIVE A DEFENDANT OF EFFECTIVE ASSISTANCE BY FAILING TO PROVIDE COMPETENT REPRESENTATION THAT IS ADEQUATE TO ENSURE A FAIR TRIAL, OR MORE BROADLY, A JUST OUTCOME.

NO STATE MAY PROCEED AGAINST A DEFENDANT WHOSE COUNSEL, APPOINTED OR RETAINED, CANNOT DEFEND HIM FULLY AND FAITHFULLY.

AS I'VE ALREADY STATED IN SEVERAL COMPLAINTS AND A MOTION PRIOR TO THIS. THE OUTLOOK, ACT OF DIRECTION, AND/OR APPROACH ROBERT KUCHAR SEEMS TO TAKE WITH THE HANDLING OF MY CASE, CHARACTERIZES THAT OF A FEDERAL PROSECUTOR, WHOSE "PURPOSE" AND "INTENT" IS TO "SUFFOCATE" RATHER THAN GIVE "LIFE" TO ANY POSSIBLE "BELIEF" THAT MAY "EXIST."

IN AUGUST OF 2018, INSIDE THE CHARLES EVANS WHITTAKER FEDERAL COURTHOUSE, BEFORE UNITED STATES FEDERAL MAGISTRATE JUDGE SARAH HAYS, MY MOTION ON THESE ISSUES/COMPLAINTS WAS DECIDED. IT WASN'T LONG AFTER MY MOTION DENIAL, THAT I LEARNED JUDGE SARAH HAYS NAME WAS ATTACHED TO MY CASE. I SAW THAT SHE HAD SIGNED OFF ON TWO RESIDENTIAL SEARCH WARRANTS IN REGARDS TO ME. ALSO SHE SIGNED WARRANTS FOR A TRACKING DEVICE TO BE ATTACHED TO MY WIFE'S TRUCK ON MY BEHALF AND A GPS TRACKING LOCATOR TO BE ATTACHED TO PHONE IN REGARDS TO MYSELF. I BELIEVE ROBERT KUCHAR

AND JUDGE HAYS WERE BOTH AWARE OF THIS INFORMATION, WHICH WOULD BE AN OBVIOUS CONFLICT OF INTEREST, AND APPEAR TO MAKE MY FIRST REQUEST TO DISMISS AND REMOVE COUNSEL ROBERT KUCHAR' DENIAL BIAS.

FURTHERMORE, ROBERT KUCHAR HAS FAILED TO ACT AS AN ATTORNEY INVIOLATED BY "STRICKLAND" IN THE WAY HIS "INEFFECTIVENESS" HAS POSITIONED HIM TO JEOPARDIZE/SABOTAGE MY CASE.

Respectfully submitted,
Edward Gleason

Subscribed and sworn before me on this 23rd day of January 2019 in Bates County Missouri

Commission Expires
June 6, 2020

Rebecca Terry

